



Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

BENJAMIN E. ROSENBERG

benjamin.rosenberg@dechert.com
+1 212 698 3622 Direct
+1 212 698 0495 Fax

September 22, 2020

BY ECF

Hon. J. Paul Oetken
Room 2101
40 Foley Square
New York, NY 10007

Re: *In re Application of Karam Salah Al Din Awni Al Sadeq for an Order Case No. Under 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings; 1:20-mc-00275-JPO*

Dear Judge Oetken:

I represent Dechert LLP, which is the recipient of a subpoena for which this Court granted Plaintiff Karam Salah Al Din Awni Al Sadeq leave to serve on August 4, 2020. It is my understanding that Plaintiff served his subpoena on the New York Secretary of State on August 20, 2020, pursuant to New York Partnership Law Section 121-1505. However, the New York Secretary of State did not deliver the subpoena to Dechert's registered agent for service until September 17, 2020, and Dechert did not receive the subpoena until yesterday, which was six days after the specified return date of September 14, 2020.

Dechert objects to the subpoena and intends to file a Motion to Quash. Dechert respectfully requests two weeks to prepare that Motion, meaning it would be due on October 6, 2020. Earlier today, counsel for Mr. Al Sadeq confirmed by email that they consent to this request. This is Dechert's first request for an extension of time.

Sincerely,

/s/ Benjamin E. Rosenberg

Benjamin E. Rosenberg